

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

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|-----------------------|---|--------------------------|
| BRIAN DAVID CAMPBELL, |) | |
| |) | |
| Plaintiffs, |) | No. 3:10-cv-0397 |
| |) | |
| v. |) | Judge Campbell |
| |) | |
| CITY OF NASHVILLE, |) | Magistrate Judge Griffin |
| Defendant. |) | |

PROTECTIVE ORDER

Defendant, the Metropolitan Government of Nashville and Davidson County, Tennessee has subpoenaed records from Vanderbilt University Medical Center, Baptist Hospital, United Methodist Publishing House, and Dollar General. Defendant submits this Proposed Protective Order to protect the confidentiality of documents and information obtained from these sources.

Defendant agrees that all medical information and records obtained through discovery will be kept confidential throughout the duration of this case. Furthermore, Defendant agrees that all of Plaintiff's employment records will be kept confidential throughout the duration of this case.

Documents and information subject to this Protective Order shall only be disclosed to the parties' attorneys, legal assistants, legal secretaries, and any expert(s), and shall be designated "Attorneys' Eyes Only." The parties shall make use of these documents and this information only in furtherance of this lawsuit. The documents and information shall remain in a confidential

status throughout all proceedings in this case up to and including any trial and/or appeal. However, the terms of this Protective Order shall not affect the admissibility at trial of any document or information covered hereunder, presuming all other requirements for admissibility are met.

It is therefore ORDERED that any medical records obtained through discovery shall be considered confidential "Attorneys' Eyes Only," and may only be disclosed to the parties' attorneys, legal assistants, legal secretaries, private investigators, and any expert(s).

It is further ORDERED that any employment records obtained through discovery shall be considered confidential "Attorneys' Eyes Only," and may only be disclosed to the parties' attorneys, legal assistants, legal secretaries, private investigators, and any expert(s).

It is further ORDERED that all such documents and information shall remain in a confidential status throughout the proceedings in this case.

It is further ORDERED that at the conclusion of this matter, whether after a trial, or as the result of a subsequent appeal, all such documents and information shall be destroyed.

IT IS SO ORDERED.

SIGNED the 1st day of June, 2011.

MAGISTRATE JUDGE GRIFFIN

APPROVED FOR ENTRY:

s/ Kevin C. Klein

Kevin C. Klein, #22301

Allison L. Bussell, #23538

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served via U.S. Mail, postage prepaid, on Brian David Campbell and Elaine Pitman, 1045 E. Trinity Lane, Nashville, Tennessee 37216 on this 11th day of May, 2011.

s/ Kevin C. Klein

Kevin C. Klein